

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE**

JULIE WERNERT and SCOTT)	
WERNERT, as next friends for C.W.,)	
)	
<i>Plaintiffs,</i>)	
)	
-vs-)	Case No. 3:24-c-01000
)	District Judge Aleta Trauger
WILLIAMSON COUNTY BOARD)	Magistrate Judge Jeffrey Frensley
OF EDUCATION and STACEY)	Jury Demand
EDMONDSON, in her official capacity)	
as District Attorney for the 21st)	
Judicial District of Tennessee,)	
)	
<i>Defendants.</i>)	

**DEFENDANT WILLIAMSON COUNTY BOARD OF EDUCATION’S MOTION TO
DISMISS STATE LAW CLAIMS**

Comes now Defendant Williamson County Board of Education (“WCBOE”), pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, and submits this Motion to Dismiss the claims brought by Plaintiffs under the Governmental Tort Liability Act.

For cause, Defendant WCBOE would show that the Tennessee Governmental Tort Liability Act immunizes it from Plaintiffs’ negligent infliction of emotional distress claims. Accordingly, as more fully stated in the accompanying Memorandum of Law, Defendant WCBOE respectfully requests that the Court dismiss the claims against it.

Respectfully submitted,

s/ Lisa M. Carson

Lisa M. Carson (BPR #14782)
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been electronically filed and delivered via the Court's ECF-Filing System to Attorneys for Plaintiffs Larry Crain and Emily Castro, larry@crainlaw.legal, emily@crainlaw.legal, 5214 Maryland Way, Suite 402, Brentwood, TN 37027 and Attorneys for Defendant Stacy Edmonson, Cody N. Brandon, Cody.Brandon@ag.tn.gov, Office of the Tennessee Attorney General, P.O. Box 20207, Nashville, TN 37202, on this the 1st day of October, 2024.

s/Lisa M. Carson
Lisa M. Carson